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October 7, 2022

Via ECF and email

Hon. Sean H. Lane, U.S.B.J.
300 Quarropas Street
White Plains, NY 10601-4140

RE: Yeshiva Chofetz Chaim Inc. v. 82 Highview LLC (22-7033)

Dear Judge Lane:

The undersigned is counsel to the Defendants in the above-referenced Adversary Proceeding and special litigation counsel to the Debtor in the underlying bankruptcy case (22-22493). As the Court is aware, a stipulated scheduling order was issued by the Court which provided for responses to paper discovery demands by today, and actual production by October 24th. The Court indicated that, if there were unresolved objections, the Court would schedule a conference to rule on the same in advance of the production date. Late this afternoon, we received the Plaintiffs' responses to our discovery demands and virtually all of them were objected to. While we will, of course, meet and confer with Plaintiffs' counsel in an attempt to resolve those objections, I believe that it is extremely unlikely that we will be able to do so given the parties disparate views as to the appropriate scope of discovery. As such, we are respectfully requesting that the Court conduct a discovery conference to rule on the objections on either October 19th, 20th or 21st.¹ Although I will be out of the country through October 25th, Bankruptcy counsel for the Debtor will handle the appearance before the Court.

Thank you for your attention.

Respectfully,

s/ *Michael Levine*

MICHAEL LEVINE

cc. All counsel (via ECF and email).

¹ We are not permitted to engage in any legal work for this client during the Jewish Holiday of Sukkot which runs from October 9th through October 18th.